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14 JACOB LAWSON, and ZACHARY KOSOJET  
15

16 **UNITED STATES DISTRICT COURT**  
17 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

18 LIGHTS OUT HOLDINGS, LLC, a  
19 California limited liability company,

20 Plaintiff,

21 v.

22 LIGHTS OUT APPAREL, LLC, a  
Maryland limited liability company;  
23 JACOB LAWSON and ZACHARY  
KOSOJET, individuals d/b/a LIGHTS  
24 OUT BILLIARDS APPAREL; and  
DOES 1 through 10, inclusive,  
25

26 Defendants.  
27  
28

Case No. 3:16-cv-02195-JAH-NLS

**JOINT MOTION TO DISMISS  
ACTION WITHOUT PREJUDICE**

Hon. John A. Houston  
Courtroom: 13B

Action filed: August 30, 2016  
Trial Date: None Assigned

1 **NOTICE IS HEREBY GIVEN TO THIS HONORABLE COURT AS**  
2 **FOLLOWS:**

3 **WHEREAS**, Plaintiff, LIGHTS OUT HOLDINGS, LLC (“Plaintiff”), and  
4 Defendants LIGHTS OUT APPAREL, LLC, JACOB LAWSON, and ZACHARY  
5 KOSOJET (collectively, “Defendants”) have reached a resolution of all claims in this  
6 action;

7 **THE PARTIES HEREBY JOINTLY MOVE** for an order pursuant to Fed. R.  
8 Civ. P. 41(a)(1)(A)(ii), to dismiss this action in its entirety, without prejudice, that all  
9 Parties bear their own fees and costs, and that this Court retain jurisdiction as may be  
10 needed to enforce the terms of a settlement agreement entered into by the Parties. It is  
11 further stipulated that there is no prevailing party in this action.

12  
13 Respectfully submitted,

14  
15 Dated: September 13, 2017

BRUTZKUS GUBNER

16 By: /s/ Jeffrey A. Kobulnick

17 Jeffrey A. Kobulnick

18 Mark D. Brutzkus

Michael A. Bernet

19 Attorneys for Plaintiff

LIGHTS OUT HOLDINGS, LLC

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23 Dated: September 13, 2017

24 SHUMAKER, LOOP & KENDRICK,  
25 LLP

26 By: /s/ Steven M. Berman

27 Steven M. Berman

28 Attorneys for Defendants,

LIGHTS OUT APPAREL, LLC, JACOB

LAWSON, and ZACHARY KOSOJET

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**SIGNATURE CERTIFICATION**

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Steven M. Berman, the attorney for Defendants LIGHTS OUT APPAREL, LLC, JACOB LAWSON, and ZACHARY KOSOJET, and that I obtained Mr. Berman's authorization to affix his signature to this document.

Respectfully submitted,

Dated: September 13, 2017

BRUTZKUS GUBNER

By: /s/ Jeffrey A. Kobulnick

Jeffrey A. Kobulnick

Mark D. Brutzkus

Michael A. Bernet

Attorneys for Plaintiff

LIGHTS OUT HOLDINGS, LLC

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